

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

<b>BLAKE HIGGINS,</b>	)
	)
<b>Plaintiff,</b>	)
	)
v.	) Case No. 11-CV-090-JHP-TLW
	)
<b>STATE AUTO PROPERTY &amp;</b>	)
<b>CASUALTY INSURANCE COMPANY,</b>	)
	)
<b>Defendant.</b>	)

**PLAINTIFF'S OBJECTIONS TO DEPOSITION  
DESIGNATIONS OF GEORGE GARTELOS**

Plaintiff, pursuant to LCvR30.1(c), submits his objections to the designations and counter-designations of the deposition. Counsel for the parties have personally met and resolved some of the objections. The parties were unsuccessful in their attempt to resolve the following objections to the deposition. The transcript of this deposition will be submitted to the Court Clerk with the indicated testimony highlighted and the indicated objections referenced in the margins. The Plaintiff's designations are highlighted yellow. The Defendant's designations are highlighted orange.

22:9 – 23:9	11
72:24	12
119:20 – 120:10	3
129:10-23	13

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**OBJECTIONS**

- 3. The testimony does not respond to a pending question.
- 11. The testimony is inadmissible because it is irrelevant.
- 12. Repetitive.
- 13. Testimony of a collateral source of benefits, i.e. other insurance, is irrelevant.

Motion in limine filed.

Respectfully submitted,

TOON OSMOND, P.L.L.C.

/s/ Brian Goree

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 5<sup>th</sup>, 2012, I electronically transmitted the attached document to the Clerk of the Court using the ECF System for filing. Based on the records currently on file, the Clerk of the Court will transmit a Notice of Electronic Filing to the following ECF registrants:

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/s/ Brian Goree